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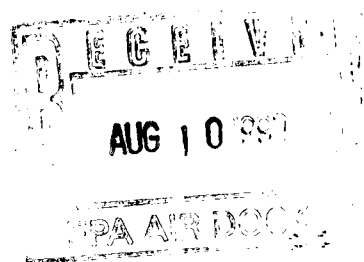
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July 2, 1990

Mr. William K. Reilly, Administrator
U. S. Environmental Protection Agency
401 M Street, NW, Washington, D.C. 20460



Dear Mr. Reilly:

RE: The application of Ethyl Corporation for a fuel additive waiver under 211 (f) (4) of the Clean Air Act

Quaker State Corporation is submitting this letter in support of Ethyl Corporation's request for a waiver from the US EPA to market its HITEC 3000 Performance Additive for unleaded gasoline.

We have reviewed Ethyl Corporation's petition and we are impressed by their fleet data demonstrating that use of the HITEC 3000 Performance Additive did not interfere with the emission control system performance on the test vehicles. We also find persuasive, the fact that the manganese-based additive has been used in Canada since 1978 with no demonstrated harmful effects to the environment.

Quaker State Corporation owns and operates a small specialty petroleum refinery in Congo, West Virginia. Our principle products are lubricating base stocks, however, in the refining process, we also produce gasoline which we sell to wholesalers. As an extremely small refiner, Quaker State is finding it increasingly difficult to comply with all environmental regulations and still remain cost competitive in a market dominated by large refiners since much of the technology available to them is not feasible for small refineries. We believe that Ethyl's HITEC 3000 Performance Additive can offer significant benefits to small refineries such as Quaker State by lowering the cost of producing gasoline while at the same time raising octane performance levels. We further believe that such an additive could lower the severity needed from our Unifiner/Platformer and thereby increase yields. There would also be a slight improvement in the volume of emissions from heaters resulting from less fuel required for the refining process.

We hope that after reviewing all of the materials submitted in support of the fuel additive waiver that the EPA will promptly approve this product and make it available to the marketplace. It is our opinion that it offers significant environmental advantages.

Sincerely yours,

Jack W. Corn
Vice Chairman and
Chief Executive Officer

JWC/BS